

September 5, 2007

FILED/ACCEPTED

SEP 10 2007

To the Members of the United States Senate
To the Members of the United States House of Representatives
To the Members of the Federal Communications Commission

Federal Communications Commission
Office of the Secretary

Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

Dear Senators, Representatives and FCC Commissioners:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,



Mark L. Winslow
VP & General Manager
Crystal Cable TV, Inc.
Crystal MI 48818

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

From: McClure, Charlotte [mailto:Charlotte.McClure@cableone.net]
Sent: Wednesday, September 05, 2007 11:14 AM
To: Deborah Tate
Subject: Triple-Carriage order Wrong Public Policy for Small Cable

September 5, 2007

The Honorable Deborah Taylor Tate:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

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The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Charlotte McClure
General Manager
Cable One, Inc

112 E. 32nd ST
P.O. Box 2525
Joplin, MO 64803-2525

417/206-5300

From: Kim [mailto:kimw@wgtu.com]
Sent: Thursday, September 06, 2007 10:38 AM
To: Kevin Martin; Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell;
mmacbride@nab.org
Cc: jeffc@wgtu.com
Subject: FCC Letter

September 6, 2007

Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

Dear FCC Commissioners:

After reading the CableTV Viewability Proposal, I am writing to you in support of the proposal. This is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition.

TV signals must be protected from material degradation so that consumers can reap the full benefits of HDTV.

Sincerely,

Mr. Jeff Cash
President,
Max Media of Traverse City, LLC
WGTU-TV & WGTQ-TV

/kw

C: The Honorable Kevin J. Martin, Chairman (via email)
The Honorable Michael J. Copps, Commissioner (via email)
The Honorable Jonathan S. Adelstein, Commissioner (via email)
The Honorable Deborah Taylor Tate, Commissioner (via email)
The Honorable Robert M. McDowell, Commissioner (via email)
Marsha MacBride, Exec. VP, Legal & Regulatory Affairs, NAB (via email)

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Version: 7.5.485 / Virus Database: 269.13.7/992 - Release Date: 9/6/2007

8:36 AM

From: Craig Montgomery [mailto:Craig.Montgomery@fidelitycommunications.com]
Sent: Thursday, September 06, 2007 10:23 AM
To: Kevin Martin
Cc: Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell
Subject: Triple Carriage Order

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

September 6, 2007

To the Honorable Kevin Martin and FCC Commissioners

Re: FCC's Proposed Triple Carriage Must-Carry Order

Dear Chairman Martin and Commissioners:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand.

In addition, Fidelity Communications and other operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009, to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation.

The upgrade costs required to comply with this mandate are substantial --- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operators would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

John E. Colbert
Senior Vice President
Fidelity Communications
64 N. Clark
Sullivan, MO 63080

FILED/ACCEPTED

SEP 10 2007

September 6, 2007

To the FCC Commissioner's

Federal Communications Commission
Office of the Secretary

Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

Dear Commissioner's:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

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The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,
Andrew M. Randol, GM -Panora Telco

From: Pauline C Harris [mailto:pharris@hearst.com]
Sent: Thursday, September 06, 2007 9:11 AM
To: Kevin Martin; Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell
Subject: CableTV Viewability Proposal (From WTAE-TV, Pittsburgh)

On behalf of WTAE-TV in Pittsburgh, I would like to register our support for the **CableTV Viewability Proposal** which I understand will be considered at a September 11, 2007 meeting.

We view this proposal as the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition occurs.

It is our hope and expectation that our TV signal will be protected from material degradation, and that our viewers/consumers will be able to enjoy the full benefits of High Definition Television.

We ask that you vote in support of the **CableTV Viewability Proposal**.

Rick Henry
President and General Manager
WTAE-TV
400 Ardmore Boulevard
Pittsburgh, PA 15221
412-244-4410
rlhenry@hearst.com

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

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=====



ALLEN'S TV CABLE SERVICE, INC.

PHONE: 384-8335
811 EVERETT STREET

P. O. BOX 2643
MORGAN CITY, LA. 70381

September 5, 2007

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Honorable Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

SEP 10 2007

Federal Communications Commission
Office of the Secretary

Dear Chairman Martin:

It is my understanding that consideration is being given to a proposal that would require cable providers to carry broadcaster's transmissions on their systems in three (Triple Carriage) formats; Analog, High Definition and Standard Definition. Before this is acted upon, I urge you to consider the consequences of such a requirement.

To a small cable operator, such a requirement would be devastating. Currently we carry thirteen (13) area broadcasters on our system. To give each station, three (3) channels of capacity, would encompass (39) channels or 234 Mhz. Given the fact that they possibly could also multicast their standard digital channels on a 10 to 1 ratio, the usage now jumps to 294 Mhz. Considering the system operates at 720 or 862, virtually 41% would be for broadcasters leaving a little over half of our capacity to carry all other signals on the system, including any new cable channels, broadband or voice products. As it stands today, a number of channels, including some broadcasters, would have to be dropped in order to comply. I do not think our customers would be very happy with such a scenario.

Is it not enough that broadcasters who now offer their analog, digital and high definition signals free over-the-air to their viewers are demanding payment from those same viewers simply because they choose to receive their signals from a cable provider? Our systems have tried for almost two years to obtain permission to carry the HD product of the local CBS affiliate. The answer: "Unless payment is made, NO carriage will be authorized." The dilemma, if we pay one broadcaster, then we will have to pay them all... so the CBS HD product is not offered. We try to maintain rates as low as we can... but unfortunately have already lost customers because of taking this stand. If this proposal is initiated, I contest that the "Triple Carriage" could signal the beginning of the demise of many small to medium operators, such as us. Please TOSS this idea... and I thank you in advance!

Sincerely,

Gregory A. Price, President

Cc: Each local District U.S. Representatives and Senators



CBS Affiliate
KWCH DT 12

SUNFLOWER BROADCASTING, INC

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

September 5, 2007

The Honorable Deborah Taylor Tate
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Dear Commissioner Tate:

I am writing in support of the Cable TV Viewability proposal that will be before your Commission meeting on September 11, 2007.

I am strongly in favor of this proposal to protect the digital television transition and assure that both analog and digital subscribers are able to receive our best signal after February 17, 2009. The transition from analog to digital is going to be a monumental undertaking for a large number of television viewers, some of whom rely solely on their television for news and entertainment in remote locations in Kansas and will be at a loss to understand what is going on if their television sets simply go black and they haven't any idea what is happening or why.

Approval of this proposal is the only way to guarantee that analog cable subscribers will not be disenfranchised after DTV transition. It will protect analog cable subscribers from loss of service after February 17, 2009 and would also ensure that DTV signals will not suffer material degradation when carried on cable systems.

I respectfully ask for your vote in favor of the Cable TV Viewability Proposal.

Sincerely,

Joan M. Barrett
President & General Manager
Sunflower Broadcasting, Inc.
KWCH-TV/KBSD-TV/KBSH-TV/KBSL-TV/KSCW-TV

2815 E 37th ST NORTH WICHITA, KS 67219 (316) 838-1212



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SEP 10 2007

Federal Communications Commission
Office of the Secretary

September 5, 2007

The Honorable Deborah Taylor Tate
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Commissioner Tate:

It is my understanding that the Federal Communications commission has prepared a proposal for Cable TV Viewability which will be under consideration in your September 11, 2007 meeting. As a local broadcaster, I urge you to closely review and support this FCC proposal due to its importance for the American consumer – who are viewers of our local television stations in Northern Michigan..

The proposal gives cable operators two options in delivering both the analog and digital signal of our station; or the digital only signal, but ensuring that their system subscribers have the necessary down conversion equipment on their analog set to receive our local signals. This proposal will protect analog cable subscribers from loss of service after the February 17, 2009 DTV deadline, as well as ensure that local digital television signals will not suffer material degradation when carried on our local cable systems.

This proposal is the only way to guarantee that analog cable subscribers will receive the full benefit of the new HDTV signals from local broadcasters. Your support in this matter is greatly appreciated.

Most Sincerely,

Julie A. Brinks
VP/General Manager
WPBN-TV 7 WPBN-DT Traverse City, MI
WTOM-TV 4 WTOM-DT Cheboygan, MI

WPBN / WTOM - TV

P.O. Box 546 • Traverse City, MI 49685 • (231) 947-7770 • Fax (231) 947-1229

From: Pfaff, Charlie [mailto:CPfaff@kmpfh.com]
Sent: Wednesday, September 05, 2007 7:35 PM
To: Deborah Tate
Cc: Pappas, Peter
Subject: DTV Carriage "Viewability" Rules

FILED/ACCEPTED

SEP 10 2007

The Honorable Deborah Taylor Tate
Commissioner
Tel: (202) 418-2500
Fax: (202) 418-2439
Email: Deborah.Tate@fcc.gov

Federal Communications Commission
Office of the Secretary

Dear Commissioner Deborah Taylor Tate:

I am the General Manager of Pappas Telecasting's Station KFRE, the CW affiliate in Fresno, CA. I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and I am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Charles W. Pfaff

Senior Vice President/General Manager

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From: Pfaff, Charlie [mailto:CPfaff@kmpfh.com]
Sent: Wednesday, September 05, 2007 7:00 PM
To: Deborah Tate
Cc: Pappas, Peter
Subject: DTV Carriage "Viewability" Rules

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

The Honorable Deborah Taylor Tate
Commissioner
Tel: (202) 418-2500
Fax: (202) 418-2439
Email: Deborah.Tate@fcc.gov

Dear Commissioner Deborah Taylor Tate:

I am the General Manager of Pappas Telecasting's Station KMPH, the FOX affiliate in Fresno, CA. I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and I am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

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Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Charles W. Pfaff

Senior Vice President/General Manager

CONFIDENTIALITY NOTICE: Unless otherwise indicated or obvious from the nature of the transmittal, the information contained in this e-mail message and all attachments is confidential information intended for the use of the sender's intended recipients, including Deborah.Tate@fcc.gov, pcp@PappasTV.com. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication or its attachments is strictly prohibited. Any views or opinions presented in this email are solely those of the author and might not represent those of Pappas Telecasting Companies or its affiliated entities (collectively, PTC). If you have received this communication in error, please notify the sender immediately by replying to this communication and please delete it from your computer. Warning: Although the message sender has taken reasonable precautions to ensure no viruses are present in this email, PTC cannot accept responsibility for any loss or damage arising from the use of this email

From: Tom Fawbush [mailto:tom@wbna21.com]
Sent: Wednesday, September 05, 2007 6:30 PM
To: Kevin Martin; Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell
Subject: Please support the CABLETV VIEWABILITY PROPOSAL

I want to encourage the commission to adopt and support the CableTV viewability proposal. We will not be able to service our local viewers properly unless local cable systems pass through our digital television signal, intact, not stripped down. We need action on this desperately as the 2009 DTV switch is just around the corner.

Sincerely,
Tom Fawbush
WBNA TV21

www.wbna21.com
General Manager
Louisville, KY
PH: (502) 964-2121 x17
FX: (502) 966-9692
tom@wbna21.com

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

September 5, 2007

FCC Commissioner Robert McDowell
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Proposed Triple Carriage Must-Carry Order

The Honorable Robert McDowell:

Tacoma Power's Click! Network strongly opposes the proposed triple carriage must-carry order. As a municipal cable operator and member of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA), Click! Network provides true competition in the cities where we offer services. Cable TV and Internet customers in Tacoma, Fircrest, University Place, Lakewood, Fife and Pierce County enjoy video and broadband choices that are rare in this country. Ten years ago Tacoma Power invested in fiber/coax infrastructure primarily for the power company's needs on which Click! Network also offers competitive telecommunication services.

Click! Network and other members of the ACA and NTCA are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per customer in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their customers.

If the triple-carriage requirement is enforced, Click! Network would be forced to remove existing channels from our channel lineup and reduce the amount of bandwidth available for broadband and voice services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their customers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm consumers and the companies that serve them. The Associations and their community-based members, along with the millions of customers they serve, and the 25,000 customers Click! Network serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service our customers enjoy and have come to expect from us.

Sincerely,

Cynthia Wikstrom
General Manager
Click! Network, Tacoma Power

FILED/ACCEPTED

From: Tom Tolar [mailto:ttolar@wrcbtv.com]
Sent: Wednesday, September 05, 2007 6:02 PM
To: Deborah Tate
Subject: Cable TV Viewability Proposal

SEP 10 2007
Federal Communications Commission
Office of the Secretary

Dear Commissioner Tate,

Greetings from all your friends in the great state of Tennessee. I write to ask you to support the Cable TV Viewability Proposal when it is considered at your meeting on September 11th. WRCB-TV/DT serves more than 845,000 television households. We have viewers in Tennessee, Georgia, North Carolina and Alabama. Since our viewing area is mountainous, our viewers depend on a mix of over-the-air, cable and satellite services for television reception. It is imperative that the February 17, 2009 transition date not result in a loss of service for the cable subscribers in our area. It is also imperative that they not suffer material degradation of the digital signals (including High Definition telecasts) from their cable systems. The Cable TV Viewability Proposal gives cable operators viable options for dealing with the digital transition; but, it is also the only way to guarantee the ability of our cable viewers to receive digital telecasts from free, over-the-air broadcasters after the transition date without interruption or degradation of signal quality. I will appreciate your support of this proposal.

Best regards,

Tom Tolar
President/General Manager
WRCB-TV
900 Whitehall Road
Chattanooga, TN 37405
ttolar@wrcbtv.com

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From: Bram Watkins [mailto:bwatkins@kdbc.com]
Sent: Wednesday, September 05, 2007 5:50 PM
To: Deborah Tate
Subject: DTV Carriage "Viewability" Rules

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

Dear Commissioner Tate,

I am the General Manager of Pappas Telecasting's Station KDBC TV, the CBS affiliate in El Paso, Texas.

I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Bram Watkins
General Manager
KDBC TV 4 El Paso
2201 Wyoming Ave.
El Paso, Texas 79903
Office: 915.496.4400
Cell: 915.203.5900
bwatkins@kdbc.com

From: Todd and Deb Sulsberger [mailto:mjcatl@netins.net]
Sent: Wednesday, September 05, 2007 5:00 PM
To: Deborah Tate; Kevin Martin; Jonathan Adelstein; Michael Copps; Robert McDowell
Subject: Oppose DTV Triple Carriage

September 4, 2007

FILED/ACCEPTED

SEP 10 2007

To the Members of the United States Senate

To the Members of the United States House of Representatives

Federal Communications Commission
Office of the Secretary

Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

Dear Senators and Representatives:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and eliminating access to any broadband service for some consumers.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,



Deborah C. Sulsberger
2595 Old Hwy 141
Hornick, IA 51026
member board of directors
Western Iowa Telephone Cooperative

From: Lawson Fox [mailto:LFox@KTVN.com]
Sent: Wednesday, September 05, 2007 4:59 PM
To: Deborah Tate
Subject: Cable TV Viewability Proposal

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

To The Honorable Deborah Taylor Tate:

I am writing you today to let you know that I support the Cable TV Viewability Proposal that assures carriage of must carry broadcast stations' signals in both the analog and their original digital formats. This proposal is important to a smooth and successful transition from analog to digital broadcast television.

Lawson Fox
General Manager
KTVN
4925 Energy Way
Reno, NV 89502
775-858-2222

KTVN Channel 2, 4925 Energy Way, Reno, NV 89502
Phone: 775-858-2222 Fax: 775-861-4298

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

From: LLiebe@kwch.com [mailto:LLiebe@kwch.com]
Sent: Wednesday, September 05, 2007 4:35 PM
To: Deborah Tate
Subject: CableTV Viewability Proposal

Commissioner Tate – Please open the attached PDF letter to you from Joan M. Barrett, President and General Manager of Sunflower Broadcasting, Inc., in Wichita, Kansas concerning the CableTV Viewability Proposal scheduled for your September 11, 2007 Meeting Agenda.

Thank you,

Linda Liebe
Executive Assistant to
Joan M. Barrett, President & General Manager
Sunflower Broadcasting, Inc.
KWCH-TV/KBSD-TV/KBSH-TV/KBSL-TV/KSCW-TV



ted stephens
general manager
(515) 289-4342
Cell: (515) 249-4700
tstephens@kcwi23.com

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

Dear Commissioner Tate:

I am the General Manager of Pappas Telecasting's Stations KCWI-TV and KDMI-DTV, the CW and MyNetwork affiliates in Des Moines, Iowa. I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) down converting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,
Ted Stephens
VP/General Manager
KCWI-TV/KDMI-DTV

From: Eymer, Scott [mailto:seymer@kpth.com]
Sent: Wednesday, September 05, 2007 4:30 PM
To: Deborah Tate
Cc: Pappas, Peter
Subject: DTV Carriage "Viewability" Rules

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

The Honorable Deborah Taylor Tate
Commissioner

Dear Commissioner Deborah Taylor Tate,

I am the General Manager of Pappas Telecasting's Station KPTH, the FOX affiliate in Sioux City, Iowa.

I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and

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signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the

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Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Scott Eymer
General Manager
Pappas Telecasting of Siouxland

KPTH FOX 44
My 44.2 KPTH-DT "My Network TV"

100 Gold Circle
Dakota Dunes SD 57049

phone 712-277-3554 fax 712-258-6043 cell 712-212-1152

seymer@kpth.com

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

From: Lipps, Rick [mailto:rlipps@nbc24.com]
Sent: Wednesday, September 05, 2007 4:22 PM
To: Deborah Tate
Subject: Cable TV viewability proposal

As a General Manager of a local Television station, I am both a provider and consumer of our product. Over the last decade or more, we have seen lots of developments in cell phone technology, cable television products, and other distribution systems. In spite of this more people still turn to local TV as their source for News, information, and entertainment than ever before.

The transition to Digital signals and HDTV has been very cumbersome and expensive for Broadcasters. Just as the big Networks rely on local affiliates to distribute their signal, we rely on cable systems to continue that distribution along with the addition of local News and other programming downstream. Broadcasters, Networks, Producers, etc. have spent many millions of dollars converting equipment and product for the digital and High Definition transition. If we allow cable companies to become the "weak link" in the chain, the consumers will never get the full benefit that was originally envisioned and is currently available all the way to the cable head end.

The FCC will consider the "Cable TV Viewability Proposal" during its open meeting on September 11th. This proposal will protect analog cable subscribers from loss of service and ensure that our signal can reach our consumers with the same high quality value and benefit that it started with.

On behalf of our viewers, your consideration of a positive consumer driven proposal is appreciated. I would be happy to discuss this with you or any member of your staff at your convenience.

Rick Lipps
General Manager
NBC 24 - WNWO/WNWO-DT
FAIR, ACCURATE, HONEST
PH: 1-419-531-0044

September 4, 2007

FILED/ACCEPTED

SEP 10 2007

FCC Commissioner Deborah Tate

Re: FCC Chairman Kevin Martin's Proposed ^{Federal Communications Commission} ~~Order~~ ^{Order} on ~~Triple Carriage~~ ^{Triple Carriage} Must-Carry Order

Dear Ms. Tate:

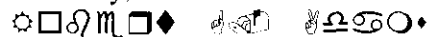
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Sincerely,



Robert G. Adams
General Manager



TELEPHONE LONG DISTANCE
INTERNET CELLULAR TELEVISION